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November 25, 2023

VIA ECF

Honorable Anne Y. Shields, U.S.M.J.
100 Federal Plaza
P.O. Box 830
Central Islip, New York 11722

Re: *Cain v. United Mortgage Corp. and Emmanuel Catechis*
Case No.: 21-cv-3325(DRH)(AYS)

Dear Judge Shields:

Our office is counsel to Plaintiff Michael Cain ("Plaintiff") in the above-referenced matter. We submit this joint letter with counsel for Defendants United Mortgage Corp. and Emmanuel Catechis (collectively, "Defendants"). We write to request a 60-day extension to the close of fact discovery. The parties have exchanged hundreds of pages of documents and are completing depositions of several witnesses. The Plaintiff has completed his psych medical examination and has turned over the report to the Defendants. The parties have been working collegially to get the discovery process completed, but due to several deaths in Plaintiff's immediate family Plaintiff, it has caused delays. There are currently three individuals left to depose, including Defendant Catechis. Taking the winter holiday and travel season into consideration, we are asking for 60 days to depose the remaining three fact witnesses. Depending on what is uncovered during these depositions, there may be a need for the request and disclosure of additional documents.

Defendants have informed Plaintiff that they intend to schedule an independent medical examination of Plaintiff. We are in the process of scheduling the independent medical examination.

Current Deadlines:

1. All fact discovery shall be completed by November 21, 2023



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2. Expert discovery shall be completed by February 19, 2024
3. The dispositive motion shall initiate on or before March 19, 2024
4. Joint proposed pretrial order on or before April 23, 2023

New Proposed deadlines:

5. All fact discovery shall be completed by January 20, 2024
6. Expert discovery shall be completed by April 19, 2024
7. The dispositive motion shall initiate on or before May 19, 2024
8. Joint proposed pretrial order on or before June 22, 2023

We thank this Court for its courtesies and consideration.

Tyrone A. Blackburn, Esq.
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CC:

All attorneys of record via ECF.



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